- try and mutually diagnose problems.⁴ NorthPoint has successfully used this approach with other incumbent LECs to diagnose order management problems and develop mutual process improvements that result in better customer service provided by both companies.
- 13. Up until last week, SWBT had refused to work with NorthPoint to reconcile data, instead pointing NorthPoint to the charts and graphs on the SWBT web site. Those charts and graphs are inadequate because they merely provide results which are often incomplete, and no insight into the process itself.
- 14. SWBT has inconsistent policies on mitigating delays in orders due to SWBT's error.

As discussed in NorthPoint's first round of comments, NorthPoint's orders are often delayed due to errors in SWBT's databases or errors by SWBT's service representatives. For example, if SWBT's loop qualification for a particular loop order did not indicate that the loop needed conditioning for DSL service, but upon testing of the loop, the SWBT technician discovered that the loop did need conditioning, NorthPoint would be required to supplement the order and restart the clock on that order with new a due date ten days out, even though the order had been in SWBT's system for at least five days.

15. As discussed above, sometimes SWBT's service representatives make mistakes retyping orders into SWBT's systems, which causes the orders to be rejected back to NorthPoint. In addition, SWBT's practice of identifying errors in a serial fashion, rather than identifying all errors at one time, causes unnecessary delays. For example, NorthPoint's order may be rejected initially for an incomplete address, but after NorthPoint corrects

⁴ NorthPoint has been exchanging daily progress reports on DSL loop orders with Bell Atlantic since September 1999, in order to reconcile data and mutually agree on process improvements. Bell Atlantic was cooperative and willing to implement the reports at NorthPoint's request. As a result of this effort and other contemporaneous work, NorthPoint has seen sustained improvement of its ordering and provisioning processes.

the order and re-submits it, the order may be subsequently rejected for a "pairgain only" or no facilities because the end user is served exclusively by fiber. ⁵ As defined in SWBT's own practices, SWBT's service representative should have reviewed the entire order at once, and returned it once with all of the errors identified so that NorthPoint would only supplement the order once. This policy is consistently ignored by SWBT service representatives.

- 16. For each reject, NorthPoint must supplement the order and push the due date farther out.

 Once NorthPoint supplements an order, this "restarts the clock" for performance measurements and as long as SWBT meets the new due date, these orders are not counted as misses, even if they are provisioned weeks after the original due date. This occurs even if the reject was invalid and due to SWBT's error. NorthPoint has requested expedited "supplemental" provisioning intervals and a revised order supplement process if rejects and jeopardies are due to SWBT's database or manual errors. SWBT has thus far refused.
- 17. SWBT continues to provide flow-through processes for its own ADSL-capable loops, but not for other types of DSL loops. As discussed in NorthPoint's opening comments, SWBT's original 271 application notes that SWBT has implemented flow-through processes for ADSL-capable loops under 12,000 feet. This type of loop makes up the

⁵ NorthPoint should be informed of a "pairgain only" situation during the prequalification process by receiving a "Red" indicator. However, NorthPoint has had several orders indicate green or yellow on prequalification, but turn out to be unsuitable for DSL because no copper is available. This makes it very difficult to set customer expectations and the customer will often cancel service rather than receive a slower speed DSL service on fiber.

vast majority of its own retail orders, but a very limited number of Competitive Local Exchange loop orders. By implementing flow-through ordering for its retail services, SWBT has acknowledged that flow through is the most efficient in providing service because a flow-through process eliminates all manual intervention and potential system breakdown.

- 18. In meetings with NorthPoint, SWBT has stated its intention to expand flow-through capability to all DSL loops under 12,000 feet, regardless of DSL type. As of this filing, SWBT is still providing flow-through treatment for ADSL loops only, while competitive LEC's SDSL and IDSL orders require a manual process.
- 19. Particular SWBT proposals for process improvements are not properly designed.

 In its opening comments, NorthPoint stated that SWBT was unilaterally changing the due date on NorthPoint's loop orders, without informing NorthPoint until after the original due date was missed. In fact, it often times took a proactive call on the part of NorthPoint's representatives to find out the status of a particular order. Meanwhile, NorthPoint's end user customer wasted his or her time waiting for the SWBT technician who never showed up.
- 20. As discussed above, SWBT and NorthPoint identified the source of this problem during subsequent meetings. Because the LOC, SWBT's provisioning center, uses different internal systems to track a competitive LEC's loop order it could not communicate jeapordies with an order to the LSC. The LSC, in turn, does not communicate order status to NorthPoint, including revised due dates, in a timely and efficient manner. This

⁶ When we brought this problem to SWBT's attention, SWBT acknowledged that NorthPoint should not have to supplement an order, and move the due date, when it is a SWBT-caused error. Unfortunately, due to poor training of LSC representatives, NorthPoint has found that it must

- situation happens whenever SWBT discovers a problem with the assigned loop or determines that the equipment in the field does not match the records in SWBT's loop inventory systems.
- 21. To address this issue, as of March 17, 2000, SWBT has begun sending a technician out to provision a loop on Plant Test Date, which is at least one day before the due date. SWBT's data indicates this should result in improvement in meeting due dates. NorthPoint also believes that this may be true, since this is the process improvement instituted by Pacific Bell, SWBT's affiliate company, over six months ago. NorthPoint has found that this practice does improve the provisioning process because the fact that the incumbent LEC's technician often finds problems with the order before the due date provides more opportunity for the LSC and the LOC to communicate those problems to NorthPoint ahead of the due date, so that NorthPoint can set proper customer expectations.
- 22. This process change has had an unintended result, however, that SWBT has thus far refused to correct. This process has resulted in increased "no access" jeopardies. NorthPoint communicates with its end users to expect the incumbent LEC's technician on the loop installation due date. Because the SWBT technician is now going out prior to due date, the end user customer is not likely to be expecting that visit and consequently the technician may not be able to obtain access to complete his or her work. Unlike SWBT, Pacific Bell automatically sends its technician back out on the due date if there was a "no access" situation on the plant test date. SWBT has refused to take this step.
 Instead, SWBT insists that NorthPoint supplement the order due to the no access

supplement every order upon reject or the LSC will not properly process the order. This has been especially true since SWBT's only manager that understood DSL has now left.

condition, which moves the due date farther out.⁷ This problem could be easily remedied by SWBT if SWBT used the same processes as its affiliate, Pacific Bell.

Line Sharing

- 23. I have also been involved in NorthPoint's implementation of line sharing in Texas.

 SWBT and competitive LEC's representatives have been meeting weekly to address operational issues with the implementation of line sharing throughout the SBC 13-state region. During the process, SWBT's policies and process have been slow to take shape and are constantly changing. Just in the past month we have received new or different proposals on ordering processes, network architecture, test access and interim pricing.
- 24. SWBT has not provided competitive LECs with a final schedule for line sharing availability in its region, including in Texas. I understand that SWBT has informed this Commission, in its April 5 filing, that it plans to have line sharing "generally available" to competitive LECs by the end of May. As a competitive LEC's representative to these operational discussions, I do not believe that will be possible.
- 25. Prior to last week, SWBT had claimed that it would have one specific type of line sharing available to competitive LECs throughout its region by June 6. With this type of line sharing the competitive LEC purchases its own splitter and puts that splitter in its own collocation space within SWBT's central office. Under this configuration, SWBT need only use central office cross connects to connect the competitive LEC's splitter to the incumbent LEC's main distribution frame and voice switch. This line sharing configuration requires the least amount of work on the part of SWBT. SWBT's proposal to only have this type of line sharing ready by June 6, 2000, is a hollow promise because,

⁷ Unfortunately, this supplement process restarts the clock on SWBT's performance measurements and gives SWBT a reprieve on particularly problematic orders.

- during initial discussions before this Commission, this method was identified as the least desirable configuration for line sharing according to both incumbent LECs and competitive LECs. The competitive LECs have consistently requested other configurations be available to them in a timely manner.
- 26. Ironically, on April 19, 2000, SWBT informed the competitive LECs during an operational discussion that it currently is not sure if it will be able to make the June 6, 2000, date even for the competitive LEC-owned splitter configuration.
- 27. In addition, there are further delays for the line sharing configuration in which the competitive LEC uses a SWBT-owned and controlled splitter, which SWBT must purchase and place in an incumbent LEC's area of the central office. SWBT recently issued a proposal under which line sharing would not be generally available in its region until the end of August. This schedule is attached to my affidavit as Attachment A. This schedule would not have line sharing generally available until the end of August, not May as previously suggested. Worse yet, SWBT has not committed to this proposal.
- 28. Therefore, for either line sharing configuration, competitive LEC-owned splitter or incumbent LEC-owned splitter, SWBT has not confirmed that it will have line sharing available by the Commission's June deadline, much less by the end of May as stated in its April 5 filing.
- 29. The uncertainty in deployment schedule, network configuration, interim pricing and other terms and conditions have made it very difficult for NorthPoint to create a business plan for its services offered over line-shared loops. As a result, SWBT has significantly impeded NorthPoint's ability to offer choice and innovative services to Texas consumers.

Plan of Record

- 30. I have also been involved in the incremental changes to SWBT's pre-ordering and ordering processes as a result of SWBT's implementation of the Plan of Record. On March 18, 2000, SWBT significantly changed the way in which NorthPoint uses SWBT's pre- ordering and loop qualification processes ("March 18th release"). The intent of the March 18th release was to provide competitive LECs with a mechanized, pre-order format to request "designed" loop qualification information. If competitive LECs wanted a more comprehensive and accurate loop qualification performed, the system was designed so that NorthPoint could request a manual loop qualification using the same ordering interface.
- 31. SWBT's March 18th release had several major, service affecting problems. In his Affidavit, Rod Cruz dismisses many of these problems and only mentions SWBT's failure to properly anticipate initial order volumes. NorthPoint experienced at least two additional, major problems:
 - The March 18th release initially rejected almost every NorthPoint loop order.

 After March 18, 2000, the new mechanized interface was indicating that almost every loop was erroneously identified as "pairgain only," which means that there is no available copper to serve the end user. This is a "Red" condition in SWBT's processes and SWBT's service representatives were rejecting these orders. Once

⁸ "Designed" loop make up information is different than actual loop make-up information. Designed data provide information for the standard design for the longest loop in the end user's distribution area. (Cruz at ¶ 37.) Designed data indicates what the loop *should* look like, taking into account industry standards and SWBT standards for outside loop plant. "Actual" loop make-up information uses outside plant records to develop records for specific loops. Instead of a guess, it is information about the actual loop going to a particular end-user premises. Because the performance of DSL is dependent on loop characteristics, it is critical that competitive LECs have access to actual loop make-up information, as opposed to designed data.

- this problem was fixed, NorthPoint had to resubmit several end-user orders which were erroneously rejected. This was very difficult for NorthPoint to track and resulted in delays and miscommunication to several NorthPoint end users.
- The March 18th release instituted a new, pre-ordering process for requesting loop qualification information, but the system does not work. It allows competitive LECs to request the high-level designed loop information, but competitive LECs cannot use this new system to request the more detailed and accurate actual loop qualification information. Unfortunately, once SWBT put the March 18th release into effect, it immediately dismantled the previous process allowing competitive LECs to request manual loop qualification on the loop order form. NorthPoint was stuck in a standard catch-22 situation because the new process did not work, but the old process had been dismantled. Once NorthPoint escalated this problem, SWBT put the previous process back in place. NorthPoint is now stuck with the previous, inefficient method of requesting manual loop qualification on the order form, instead of being able to take advantage of the new pre-ordering process for manual loop qualification.
- 32. These problems have made SWBT's systems even more unreliable and error-prone.

 Even as we discuss solutions to the new problems with their OSS, SWBT points to yet another promised fix to the preordering process due on April 29, 2000. From NorthPoint's perspective, there is no basis to think this April release will solve the current problems. In fact, it is likely that, at least initially, this new release will merely create new problems. NorthPoint cannot adequately track order status and communicate problems with our end users until these problems are fixed. It will be quite some time

before NorthPoint can understand and analyze SWBT's new processes to see if they will satisfy SWBT's obligation of non-discriminatory access to its OSS.

Dated: April 26, 2000

Jessica Lewandowski

ATTACHMENT A

Deployment Plan Line Sharing / POTS-Splitters

Central/West Tex		Installation	Ready
CLLI	Exchange	Due Date	for Service
AUSTTXGR06T	AUSTIN	30-May-00	6-Jun-00
AUSTTXHIDS0	AUSTIN	30-May-00	6-Jun-00
MDLDTXOXDS0	MIDLAND	30-May-00	6-Jun-00
ODSSTXEMDS0	ODESSA	30-May-00	6-Jun-00
LBCKTXPSCG0	LUBBOCK	30-May-00	6-Jun-00
AMRLTXFLDS0	AMARILLO	30-May-00	6-Jun-00
LBCKTXSWCG0	LUBBOCK	30-May-00	6-Jun-00
BGSPTXBSDS0	BIG SPRING	30-May-00	6-Jun-00
ODSSTXLICG0	ODESSA	13-Jun-00	20-Jun-00
LBCKTXFROS0	LUBBOCK	13-Jun-00	20-Jun-00
AMRLTX0215T	AMARILLO	13-Jun-00	20-Jun-00
ELPSTXMACG0	EL PASO	13-Jun-00	20-Jun-00
ELPSTXEADS0	EL PASO EAST	13-Jun-00	20-Jun-00
ELPSTXHADS0	EL PASO	13-Jun-00	20-Jun-00
AUSTTXJOCG0	AUSTIN JOLLYVILLE	13-Jun-00	20-Jun-00
ELPSTXNECG0	EL PASO	13-Jun-00	20-Jun-00
ELPSTXNODS0	EL PASO	20~Jul-00	27-Jul-00
AUSTTXHOCG0	AUSTIN	20~ไม่-00	27-Jul-00
AUSTTXTECG0	AUSTIN	20-Jul-00	27-Jul-00
ELPSTXYSDS0	EL PASO	20-Jut-00	2 7 -Jul-00
ELPSTXSECG0	EL PASO	20-Jul-00	27-Jul-00
LBCKTXPADS0	LUBBOCK	20-Jul-00	27-Jul-00
ELPSTXSHDS0	EL PASO	20-Jul-00	27-Jul-00
AUSTTXRRDS0	ROUND ROCK	20-Jul-00	27-Jul-00
AUSTTXFIDS0	AUSTIN .	20-Jul-00	27-Jul-00
PLVWTXPVDS0	PLAINVIEW	20-Jul-00	27-Jul-00
AUSTTXWADS0	AUSTIN WALNUT	20-Jul-00	27-Jul-00

AUSTIN	20-Jul-00	27-Jul-00
CEDAR VALLEY	20-Jul-00	27-Jul-00
AUSTIN	20-Jul-00	27-Jul-00
AMARILLO	20-Jul-00	27-Jul-00
ABILENE	20-Jul-00	27-Jul-00
WACO	20-Aug-00	27-Aug-00
ABILENE	20-Aug-00	27-Aug-00
PAMPA	20-Aug-00	27-Aug-00
WACO	20-Aug-00	27-Aug-00
HILLSBORO	20-Aug-00	27-Aug-00
TEMPLE	20-Aug-00	27-Aug-00
WACO SWIFT	20-Aug-00	27-Aug-00
MANCHACA	20-Aug-00	27-Aug-00
WACO	20-Aug-00	27-Aug-00
PFLUGERVILLE	20-Aug-00	27-Aug-00
	CEDAR VALLEY AUSTIN AMARILLO ABILENE WACO ABILENE PAMPA WACO HILLSBORO TEMPLE WACO SWIFT MANCHACA WACO	CEDAR VALLEY 20-Jul-00 AUSTIN 20-Jul-00 AMARILLO 20-Jul-00 ABILENE 20-Jul-00 WACO 20-Aug-00 PAMPA 20-Aug-00 WACO 20-Aug-00 HILLSBORO 20-Aug-00 TEMPLE 20-Aug-00 WACO SWIFT 20-Aug-00 MANCHACA 20-Aug-00 WACO 20-Aug-00

Deployment Plan Line Sharing /POTS-Splitters

South Texas				
			Installation	Ready
CLLI	Exchange		Due Date	for Service
SNANTXDIDS2	SAN ANTONIO DIAMOND		30-May-00	6-Jun-00
CRCHTXTECG0	CORPUS CHRISTI TERMINAL		30-May-00	6-Jun-00
SNANTXTADS1	SAN ANTONIO		30-May-00	6-Jun-00
CRCHTXWYDS0	CORPUS CHRISTI		30-May-00	6-Jun-00
SNANTXPECG0	SAN ANTONIO		30-May-00	6-Jun-00
SNANTXCACG0	SAN ANTONIO CAPITOL		13-Jun-00	20-Jun-00
SNANTXWACG0	SAN ANTONIO WALNUT		13-Jun-00	20-Jun-00
CRCHTXTUCG0	CORPUS CHRISTI		13-Jun-00	20-Jun-00
SNANTXWEDS0	SAN ANTONIO WETMORE		13-Jun-00	20-Jun-00
SNANTXCUCG0	SAN ANTONIO CULEBRA		13-Jun-00	20-Jun-00
NBRNTXNBCG0	NEW BRAUNFELS		13-Jun-00	20-Jun-00
SNANTXFRCG0	SAN ANTONIO FRATT		20-Jul-00	27-Jul-00
SNANTXBACG0	SAN ANTONIO BABCOCK		20-Jul-00	27-Jul-00
LARDTXLADS0	LAREDO		20-Jul-00	27-Jul-00
SNANTXLECG0	SAN ANTONIO		20-Jul-00	27-Jul-00
SNANTXUCDS0	UNIVERSAL CITY		20-Jul-00	27-Jul-00
BWVLTXLIDS0	BROWNSVILLE		20-Jul-00	27-Jul-00
MCALTXMUCG0	MCALLEN		20-Jul-00	27-Jul-00
SNANTXGECG0	SAN ANTONIO		20-Jul-00	27-Jul-00
SGINTXSGDS0	SEGUIN FRANKLIN		20-Jul-00	27-Jul-00
EDBGTXEBCG0	EDINBURG		. 20-Jul-00	27-Jul-00
PHRRTXPHCG0	PHARR		20-Jul-00	27-Jul-00
MSSNTXMIDS0	MISSION		20~Ju1-00	27-Jul-00
HRLNTXHG03T	HARLINGEN		20-Aug-00	27-Aug-00
SNANTXSLDS0	SAN ANTONIO SHAVANO		20-Aug-00	27-Aug-00
SNANTXMADS0	SAN ANTONIO MARTINEZ	•	20-Aug-00	27-Aug-00
SNANTXMCDS0	SAN ANTONIO MEDICAL CENTER		20-Aug-00	27-Aug-00

VCTATXVICG0	VICTORIA	20-Aug-00	27-Aug-00
ALICTXALDS0	ALICE	20-Aug-00	27-Aug-00
KGVLTXKVDS0	KINGSVILLE	20-Aug-00	27-Aug-00
SNANTXEDDS0	SAN ANTONIO EDISON	20-Aug-00	27-Aug-00
BEVLTXBVDS0	BEEVILLE	20-Aug-00	27-Aug-00
CRCHTXCADS0	CORPUS CHRISTI CALALLEN	20-Aug-00	27-Aug-00
EGPSTXEPDS0	EAGLE PASS	20-Aug-00	27-Aug-00
UVLDTXUVDS0	UVALDE	20-Aug-00	27-Aug-00
SNANTXLSRS1	LEON SPRINGS	20-Aug-00	27-Aug-00

Deployment Plan Line Sharing / POTS-Splitters

Houston				
			Installation	Ready
CLLI	Exchange		Due Date	for Service
HSTNTXJACG0	HOUSTON JACKSON		30-May-00	6-Jun-00
HSTNTXHUDS0	HOUSTON HUDSON		30-May-00	6-Jun-00
HSTNTXSUDS0	HOUSTON SUNSET		30-May-00	6-Jun-00
HSTNTXBUDS0	HOUSTON BUFFALO		30-May-00	6-Jun-00
HSTNTXALDS0	HOUSTON ALIEF		30-May-00	6-Jun-00
HSTNTXNACG0	HOUSTON NATIONAL		30-May-00	6-Jun-00
HSTNTXPRCG1	HOUSTON PRESCOTT		30-May-00	6-Jun-00
HSTNTXBADS0	HOUSTON BAMMEL		30-May-00	6-Jun-00
HSTNTXAIDS0	HOUSTON AIRLINE		30-May-00	6-Jun-00
HSTNTXHODS0	HOUSTON HOMESTEAD		30-May-00	6-Jun-00
HSTNTXBRCG0	HOUSTON BARKER		30-May-00	6-Jun-00
HSTNTXMOCG0	HOUSTON MOHAWK		13-Jun-00	20-Jun-00
HSTNTXFADS0	HOUSTON FAIRBANKS		13-Jun-00	20-Jun-00
SPRNTXNODS0	SPRING NORTH		13-Jun-00	20-Jun-00
HSTNTXLACG0	HOUSTON LANGHAM CREEK		13-Jun-00	20-Jun-00
HSTNTXAPCG0	HOUSTON APOLLO		13-Jun-00	20-Jun-00
HSTNTXCHRS0	HOUSTON CHANNELVIEW		13-Jun-00	20-Jun-00
GLTNTXSOCG0	GALVESTON SOUTHFIELD		13-Jun-00	20-Jun-00
TBLLTXKLCG0	TOMBALL KLEIN		13-Jun-00	20-Jun-00
HSTNTXQVDS0	HOUSTON OVERLAND		13-Jun-00	20-Jun-00
HSTNTXEERS0	HOUSTON EAST ELLINGTON		13-Jun-00	20-Jun-00
BUMTTXTECG0	BEAUMONT TERMINAL		13-Jun-00	20-Jun-00
BUMTTXTWDS0	BEAUMONT TWINBROOK		13-Jun-00	20-Jun-00
HSTNTXMCDS0	HOUSTON MEDICAL CENTER		13-Jun-00	20-Jun-00
HSTNTXSACG0	HOUSTON SATSUMA	·	20-Jul-00	27-Jul-00
HSTNTXOXCG0	HOUSTON OXFORD		20-Jul-00	27-Jul-00
HSTNTXUNCG0	HOUSTON UNDERWOOD		20-Jul-00	27-Jul-00

HSTNTXGPDS0	HOUSTON GREENSPOINT		20~	lul-00	27-Jul-00
BUMTTXUNDSO	BEAUMONT UNIVERSITY	······································	20~	ul-00	27-Jul-00
PTARTXWORS0	PORT ARTHUR WOODLAWN		20~	lul-00	27-Jui-00
HSTNTXMICG0	HOUSTON MISSION		20~	lul-00	27-Jul-00
HSTNTXWACG0	HOUSTON WALNUT		20~	lul-00	27-Jul-00
PTARTXYUDS0	PORT ARTHUR YUKON		20~	lul-00	27-Jul-00
NDLDTXNDDS0	NEDERLAND		20~	lul-00	27-Jul-00
HSTNTXLPDS0	HOUSTON LA PORTE		20	ui-00	27~Ju1-00
HSTNTXPACG0	HOUSTON PARKVIEW		20~	lul-00	27-Jul-00
SPRNTXSOCG0	SPRING SOUTH		20-	ul-00	27-Jul-00
HSTNTXCACG1	HOUSTON CAPITOL		20-	u!-00	27-Jul-00
ORNGTXORDS0	ORANGE		20	lul-00	27-Jul-00
HSTNTXORCG0	HOUSTON ORCHARD		20	lul-00	27-Jul-00
RSBGTXRRDS0	RICHMOND-ROSENBERG		20~	lul-00	27-Jul-00
HSTNTXGRCG0	HOUSTON GREENWOOD		20~	lul-00	27-Jul-00
HSTNTXGLCG0	HOUSTON GLENDALE		20~	00-lu	27-Jul-00
HSTNTXWLCG0	HOUSTON WEST ELLINGTON		20~	ul-00	27-Jul-00
HSTNTXADCG0	HOUSTON ADLINE		20~	ul-00	27-Jul-00
HSTNTXBWCG0	HOUSTON BLUERIDGE WEST		20~	ul-00	27-Jul-00
HSTNTXPERS1	HOUSTON PEARLAND		20~	nl-00	27-Jul-00
HSTNTXDPCG0	HOUSTON DEER PARK		20~	ul-00	27-Jul-00
GLTNTXSHDS0	GALVESTON SHERWOOD		20-A	ug-00	27-Aug-00
TBLLTXTBDS0	TOMBALL		20-A	ug-00	27-Aug-00
HSTNTXRECG0	HOUSTON REPUBLIC		20-A	ug-00	27-Aug-00
HSTNTXFRCG0	HOUSTON FRIENDSWOOD		20-A	ug-00	27-Aug-00
TXCYTXTCDS0	TEXAS CITY		20-A	ug-00	27-Aug-00
HSTNTXCLCG1	HOUSTON CLAY		20-A	ug-00	27-Aug-00
ALVNTXALCG0	ALVIN		20-A	ug-00	27-Aug-00
HSTNTXWECG0	HOUSTON WESTFIELD		20-A	ug-00	27-Aug-00
BYCYTX8YDS0	BAY CITY			ug-00	27-Aug-00
CLEVTXCLDS0	CLEVELAND		20-A	ug-00	27-Aug-00
CNTRTXCNDS0	CENTER		20-A	ug-00	27-Aug-00
HNVITXHNDS0	HUNTSVILLE		20-A	ug-00	27-Aug-00
CYPRTXCYDS0	CYPRESS		20-A	ug-00	27-Aug-00
HSTNTXNECG0	HOUSTON NEPTUNE		20-A	ug-00	27-Aug-00

BROOK	20-Aug-00	27 44- 00
	20-Aug-00	27-Aug-00
		27-Aug-00
S		27-Aug-00
		27-Aug-00
RSIDE		27-Aug-00
MARQUE		27-Aug-00
	20-Aug-00	27-Aug-00
		27-Aug-00
ACKSON		27-Aug-00
WOOD		27-Aug-00
THOUSTON		27-Aug-00
	300	27-Aug-00
	S ERSIDE MARQUE	20-Aug-00

Deployment Plan Line Sharing / POTS-Splitters

		Installation	Ready
CLLI	Exchange	Due Date	for Service
FTWOTXCRDS0	FORT WORTH ARLINGTON	30-May-00	6-Jun-00
DLLSTXRNDS0	DALLAS RICHARDSON-1	30-May-00	6-Jun-00
MCKNTXLIDS0	MCKINNEY	30-May-00	6-Jun-00
WCFLTXCFCG0	WICHITA FALLS	30-May-00	6-Jun-00
WCFLTXNICG0	WICHITA FALLS	30-May-00	6-Jun-00
DLLSTXRECG0	DALLAS RENNER	30-May-00	6-Jun-00
DLLSTXLADS0	DALLAS LAKESIDE	30-May-00	6-Jบท-00
DLLSTXFBCG0	DALLAS FARMERS BRANCH	30-May-00	6-Jun-00
DLLSTXADCG0	DALLAS ADDISON	30-May-00	6-Jun-00
DLLSTXEMDS0	DALLAS EMERSON	30-May-00	6-Jun-00
FTWOTXBUCG0	NORTH RICHLAND HILLS	30-May-00	6-Jun-00
DLLSTXTA03T	DALLAS TAYLOR	30-May-00	6-Jun-00
FTWOTXEUCG0	FORT WORTH EULESS	30-May-00	6-Jun-00
DLLSTXDIDS0	DALLAS DIAMOND	13-Jun-00	20-Jun-00
DLLSTXFLDS0	DALLAS FLEETWOOD	13-Jun-00	20-Jun-00
FTWOTXAXCG0	FORT WORTH WEDGEWOOD	13-Jun-00	20-Jun-00
DLLSTXGPCG0	DALLAS GRAND PRAIRIE	13-Jun-00	20-Jun-00
DLLSTXNMCG0	DALLAS NORTH MESQUITE	13-Jun-00	20-Jun-00
FTWOTXARCG0	ARLINGTON	13-Jun-00	20-Jun-00
TYLRTXSODS0	TYLER	13-Jun-00	20-Jun-00
LGVV/TXPL03T	LONGVIEW	13-Jun-00	20-Jun-00
LGVWTXGRDS0	LONGVIEW	13-Jun-00	20-Jun-00
DLLSTXMSDS0	DALLAS MESQUITE	13-Jun-00	20-Jun-00
DLLSTXWHCG0	DALLAS WHITEHALL	13-Jun-00	20-Jun-00
FTWOTXPECG0	FORT WORTH PERSHING	13-Jun-00	20-Jun-00
FTWOTXKECG0	FORT WORTH KENNEDALE	13-Jun-00	20-Jun-00
MNPLTXPADS0	MOUNT PLEASANT	13-Jun-00	20-Jun-00
FTWOTXWACG0	FORT WORTH WALNUT	20-Jul-00	27-Jul-00

ALLNTXSADS0	ALLEN	20-Jul-00	27-Jul-00
DLLSTXDACG0	DALLAS DAVIS	20-Jul-00	27-Jul-00
FTWOTXGLCG0	FORT WORTH GLENDALE	20√Jul-00	27-Jul-00
DLLSTXDVCG0	DALLAS DUNCANVILLE	20-Jul-00	27-Jul-00
MRSHTXWEDS0	MARSHALL	20-Jul-00	27-Jul-00
TYLRTXLYCG0	TYLER	20-Jul-00	27-Jul-00
DLLSTXFRCG0	DALLAS FRANKLIN	20-Jul-00	27-Jul-00
DLLSTXMCCG0	DALLAS MIDCITIES	20-Jul-00	27-Jul-00
FTWOTXEDCG0	FORT WORTH EDISON	20-Jul-00	27-Jul-00
DLLSTXNODS0	DALLAS NORTHLAKE	20-Jul-00	27-Jul-00
DLLSTXRODS0	DALLAS ROSS AVENUE	20-Jul-00	27-Jul-00
DLLSTXRICG2	DALLAS RIVERSIDE	20-Jul-00	27-Jul-00
DLLSTXFEDS0	DALLAS FEDERAL	20-Jul-00	27-Jul-00
RKWLTXPADS0	ROCKWALL	20-Jul-00	27-Jul-00
FRSCTXCODS0	FRISCO	20-Jul-00	27~Jul-00
FTWOTXATCG0	FORT WORTH ATLAS	20-Jul-00	27-Jul-00
DLLSTXDSDS0	DALLAS DESOTO	20-Jul-00	27-Jul-00
FTWOTXTEDS0	FORT WORTH TERMINAL	20-Jul-00	27-Jul-00
DLLSTXMECG0	DALLAS MELROSE	20-Jul-00	27-Jul-00
FTWOTXBERS0	FORT WORTH EAGLE MNTN LAKE	20√นเ-00	27-Jul-00
DLLSTXEVDS0	DALLAS EVERGREEN	20-Jul-00	27-Jul-00
FTWOTXCEDS0	FORT WORTH SAGINAW	20-Jul-00	27-Jul-00
FRSCTXESDS0	FRISCO	20-Jul-00	27-Jul-00
RONKTXWODS0	ROANOKE	20-Jul-00	27-Jui-00
FTWOTXBNDS0	FORT WORTH BURLESON	20-Jul-00	27-Jul-00
DLLSTXCHDS0	DALLAS CEDAR HILL	20-Jul-00	27-Jul-00
FTWOTXECCG0	FORT WORTH EDGECLIFF	20-Jul-00	27-Jul-00
DLLSTXSUDS0	DALLAS SUNNYVALE	20-Aug-00	27-Aug-00
FTWOTXBRDS0	FORT WORTH MANSFIELD	20-Aug-00	27-Aug-00
PARSTXSUDS0	PARIS	20-Aug-00	27-Aug-00
CLBNTXMIDS0	CLEBURNE	20-Aug-00	27-Aug-00
WTFRTXLYDS0	WEATHERFORD	20-Aug-00	27-Aug-00
	WHITE SETTLEMENT	20-Aug-00	27-Aug-00
CRSCTXTRDS0	CORSICANA	20-Aug-00	27-Aug-00
FTWOTXBBDS0	FORT WORTH BENBROOK	20-Aug-00	27-Aug-00

FTWOTXMADS0	FORT WORTH MARKET	20-Aug-00	27-Aug-00
FTWOTXJECG0	FORT WORTH JEFFERSON	20-Aug-00	27-Aug-00
FTWOTXCIDS0	WESTLAND	20-Aug-00	27-Aug-00
GNVLTXGLDS0	GREENVILLE	20-Aug-00	27-Aug-00
DLLSTXHACG0	DALLAS HAMILTON	20-Aug-00	27-Aug-00
FTWOTXLWDS0	FORT WORTH LAKE WORTH	20-Aug-00	27-Aug-00
TRRLTXJODS0	TERRELL	20-Aug-00	27-Aug-00
DESNTXHODS0	DENISON	20-Aug-00	27-Aug-00
WXHCTXWEDS0	WAXAHACHIE	20-Aug-00	27-Aug-00
DLLSTXLNDS0	DALLAS LANCASTER	20-Aug-00	27-Aug-00
DŁLSTXDNDS0	DALLAS DANIELDALE	20-Aug-00	27-Aug-00
GSVLTXHODS0	GAINESVILLE	20-Aug-00	27-Aug-00
DLLSTXEXDS0	DALLAS EXPRESS	20-Aug-00	27-Aug-00
FRNYTXHIRS0	FORNEY	20-Aug-00	27-Aug-00
RDOKTXHORS0	RED OAK	20-Aug-00	27-Aug-00
GRBYTXRADS0	GRANBURY	20-Aug-00	27-Aug-00
MNWLTXFADS0	MINERAL WELLS	20-Aug-00	27-Aug-00
DLLSTXRYDS0	DALLAS RYLIE	20-Aug-00	27-Aug-00
MCKNTXWE	MCKINNEY ????	20-Aug-00	27-Aug-00

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MARCH 28, 2000	
SBC/AMERITECH OSS XDSL POR COLLABORATIVE WORKSHOP	DALLAS, TEXAS 9:00 A.M.; TUESDAY, MARCH 28, 2000
	4 MR SIRLES: Good morning everybody. I 5 think we can get introductions out of the way. We
7 8	6 have agendas and we'll go through those. 7 I'm Glen Sirles, vice-president of OSS 8 and interconnection services with SBC. I have the
9 10 11 VOLUME III 12 Pages 609 to 959	9 responsibilities of all the local OSSS that 10 processes your orders. I welcome you all here 11 today. 12 We made a lot of progress on the Pian
12 13 14 15 TRANSCRIPT OF PROCEEDINGS	13 of Record over the last two sessions. I was real 14 pleased we could continue this conversation to see 15 if we can't get a agreement and understanding as to
16 17 DALLAS, TEXAS 18 MARCH 28, 2000	16 the extended enhancements that we want to make into 17 the Plan of Record. So I appreciate everybody's 18 attendance.
19 20 21	I also appreciate everybody's flexibility on rearranging the meeting. I think that's going to buy us a more productive meeting,
22 23 24	22 as well as it certainly assisted us internally with 23 some conflicts and other matters that we had as we 24 went through the scheduling process.
25 George A. Haas, CSR 5939 Page 609	Page 612
1 SBC/AMERITECH OSS XDSL POR 2 COLLABORATIVE WORKSHOP 3	1 remember from the last sessions, is ill and will 2 not be with us today. So in Kevin's absence you 3 get me. And you get John Smith, who is the
4 5 6	4 executive director of OSS on interconnection 5 services. Between John and I, we'll be working 6 with you as we try and come to where we need to be
7 8 9 9	7 on the enhancements. 8 As we did in the last session, we have 9 a court reporter with us today. I want to make
10 11 12 13 Transcript of Proceedings taken at	10 sure everybody knew that, understood that. That's 11 the way we are going to capture the meeting record. 12 It worked very effectively for us the last time. 13 So George Haas is up here in the front of the room,
14 Four Bell Plaza, Dallas, Texas, 15 commencing at 9:00 A.M., Tuesday, 16 March 28, 2000, before George A.	14 and he's capturing at this moment everything I'm 15 saying and we'll capture what you say. I hope that 16 that does not cause anyone to feel inhibited. It
17 Haas, Certified Shorthand Reporter, 18 pursuant to agreement 19	17 doesn't bother me at all, so we are going to 18 continue to have the dialogue and conversation we 19 need to have, but for George's benefit, it's going
20 21 22	20 to be important as we speak that we identify 21 ourselves. 22 He'll get to know some of you as the
23 24 25	23 conversation goes on, but it's going to be very 24 beneficial if before you speak you amounce your 25 name and your company name so he can capture it as
Page 610	Page 613
1 A-P-P-E-A-R-A-N-C-E-S 2 3	1 we are going through the day. 2 That record will be made available in 3 a similar manner as it was the last time. So the
4 SEE ATTACHED ATTENDANCE LIST 5	4 record is available to everyone here in the room as 5 well as to SBC. 6 Let's get started with introductions.
7 8 9	7 (SEE APPEARANCES AS ATTACHED) 8 (Discussion off the record.) 9 MR. SIRLES: We put the agenda together
10 1	10 based on the dialogue we had in the last couple of 11 sessions, as well as the conversations that both 12 SBC as well as the CLEC community had with the FCC.
13 14 15	13 It's basically a list of the items that we had 14 agreement over the last sessions, as well as the 15 items that we thought we had to and needed to have
16 17 18	16 continued conversation on. 17 This is not meant to be an 18 all-inclusive agenda, as we anticipate there are
19 20	19 probably some other items we need to talk about. 20 If you would, take a quick scan at it, and let me 21 know if you think it's somewhat of an agreeable
21 22 23 24	22 place to start. If so, I think we can start 23 working through some things. 24 MS_TAFF-RICE: Glen, are there some
25 Page 611	25 extras of the agenda? Page 614

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You know, Southwestern Bell -- SBC has
                                                                                                                                                ILECs service that might be an appropriate analogy.
         obviously a huge potential market that calls them for call waiting and second lines and things, and
                                                                                                                                                Then, at least ASI is the one that is going beyond
                                                                                                                                            3 just joint marketing and integrating things beyond
                                                                                                                                           4 marketing.
5 MR. SIRLES: I don't know that they are 6 precluded from doing that in the future. I don't
          that presents an automatic up sell opportunity if
     5 the same rep, through sales agency, can inquire
6 about the ASI product they are selling.
        Then, of course, access the same system and so forth, and that's all probably very
                                                                                                                                                believe they are.
                                                                                                                                                          MR. HARRIS: I had a couple of follow up
     9 kosher, but there may be an inherent disparity is
    10 really what I'm getting at.

11 MS. GENTRY: U.S. West's service reps are
                                                                                                                                         Our concern is less whether there is
joint marketing capability than how it's done. You
had mentioned at some point there will be
   12 compensated to make that additional sale. And so 13 there very quickly, SBC retail, if they take a 20 second look at red, yellow, green, they have a 15 potential to expand the sale from the call waiting
                                                                                                                                         13 additional functionality so you won't have to flow
14 the order over the wall. There would be some
15 integration between the preordering and ordering.
16 MR. SIRLES: There is always a handoff.
17 MR. HARRIS: You say there would be an
   16 to DSL
  MR. SIRLES: I fully expect our sales reps
18 to do just that. I'm not going to make you feel
19 comfortable about that. That's the way it's set
20 up. That's what we planned to do. That's what the
                                                                                                                                         18 automated process?
                                                                                                                                                         MR. SIRLES: Back up. Stop me.
                                                                                                                                         19
                                                                                                                                         20
                                                                                                                                                               Integration between preordering and
   21 merger conditions allow.
                                                                                                                                              MR. HARRIS: Transfer between a loop qualification and the actual processing of the order by ASI, that's right.

MR. SIRLES: After the sale has been
                   MR. SIEGEL: An alternative form of joint
  23 marking, an example of a hotel and rental car. You 24 call up a hotel and you set up a reservation and 25 they say, "Do you need a rental car, too?"
                                                                                                                                         23
                                                                                                                                         24
                                                                                                                    Page 897
                                                                                                                                                                                                                                                           Page 900
        I might say yes. They don't -- they don't tell me, well these are the cars available on this day, this here. They say, we are done with our transaction. I'm now going to transfer you
                                                                                                                                               concluded?
                                                                                                                                               MR. HARRIS: Correct. Your customer says, "Yes I want DSL from SWBT."
                                                                                                                                              The loop is qualified. It is somehow in the future going to be transferred over to ASI,
    5 over to an Alamo representative. And then the
    6 Alamo representative finds out what days I'm
7 interested in, what kinds of cars, checks
                                                                                                                                          6
                                                                                                                                              correct?
                                                                                                                                                         MR. SIRLES: Yes. That information will
8 availability.
9 I think in my mind that's what I
10 envisioned joint marketing doing, as opposed to
11 doing the preordering, all the work for ordering.
12 MR. SIRLES: I appreciate your analogy. I
13 have to say we are really selling the same thing.
14 That was the intent of joint marketing. They are
15 ordering scrvice from us, whether call waiting or a
16 new connect to dialtone, and at the same time they
17 want DSL. It's really the same things. I sense
18 one step that is making you somewhat unconfortable
19 is that we are qualifying the loop. We are doing
20 that to insure that we can close the sale.
21 MR. SIEGEL: Once you go through the
22 electronic process, I don't see ASI being involved
23 except for the fact they have a computer that
24 receives a file, reformats it and spits it back.
25 ASI doesn't have to employ anybody except to keep
    8 availability
                                                                                                                                               be transferred.
                                                                                                                                                         MR HARRIS: Electronically
                                                                                                                                                                                   It's not an order. It's
                                                                                                                                                         MR. OWENS:
                                                                                                                                         10
                                                                                                                                        11 order information.
12 MR HARRIS: That will include what
                                                                                                                                              information, name, address, telephone number.
MR. OWENS: Yes.
                                                                                                                                         13
                                                                                                                                             MR. OWENS: Yes.
MR. HARRIS: Loop qualification.
MR. OWENS: We are assuming because they sent the order, that the loop is qualified.
MR. SIRLES: What is wrong with that?
MR. SIEGEL: We have to train and pay our
                                                                                                                                        14
                                                                                                                                                         MR. OWENS:
                                                                                                                                         lб
                                                                                                                                        17
                                                                                                                                        18
                                                                                                                                        19
                                                                                                                                        20
                                                                                                                                              own reps in our network
                                                                                                                                              MR. HARRIS: And the office.

MR. SIRLES: We do too.

MR. OWENS: That's part of the what the sales representative negotiates with the customer.

MR. HARRIS: What additional information
                                                                                                                                        21
                                                                                                                                        23
                                                                                                                                        24
 25 ASI doesn't have to employ anybody except to keep
                                                                                                                   Page 898
                                                                                                                                                                                                                                                           Page 901
  their computer running.

MR. SIRLES: We'll tell you today, ASI

mploys quite a few people and probably will grow.

It was designed under the merger
                                                                                                                                              would the ASI service rep need to type into the
                                                                                                                                              order.
                                                                                                                                              MR. OWENS: I can't think of much more except probably, from ASI.

The only thing I can --

MR. HARRIS: The question was what
      conditions to have a very limited sales force
because its sales force is the telco.
MR. SMITH: How is that different, Howard,
   5
   б
                                                                                                                                              additional information would the ASI service rep
      from any CLEC and the other products and services they plan to sell? I mean, how is that different
                                                                                                                                              need to type into the order?

MR. OWENS: We would want to know the
                                                                                                                                          8
                                                                                                                                              customer preferences. Beyond that, that's about
 10 from MCI or Sprint?
                                                                                                                                        10
                                                                                                                                        11 it.
                 MR. SIRLES: If in your process internally
12 you had a rep who was servicing your customer, and
13 you built a system that presented a presentation to
14 them that said this loop is qualified and he wanted
                                                                                                                                       MR. HARRIS: I'm trying to understand how the joint marketing will be done if you need this information about CP. Will the end user be on the
 15 that rep to then offer and close the sale on DSL,
                                                                                                                                        15 phone or will the ASI service representative need
16 then I would hope that many of you would also want
17 your internal system to take that request and
                                                                                                                                       16 to call the end user again.

17 MS. SHINE: We are trying to clarify.

18 It's -- Ron, keep me straight. I'm not at the
18 mechanically create an LSR and send it to me via
 19 EDI.
                                                                                                                                        19 sales portion.
                                                                                                                                        At the sales portion, we are not doing
the selling on the ASI side. Joint marketing does
the selling on the ASI side. Joint marketing does
the selling on the ASI side. Joint marketing does
the selling on the ASI side. Joint marketing does

MR HARRIS: That's a good lead in to the
20
                      That's the environment we have been
21 trying to build
                                                                                                                                       21
                 MR. SMITH: And also deal with your
       customer care system; dealing with selling long
       distance or wireless service or whatever else.
                MR SIEGEL: Maybe if ASI was reselling
                                                                                                                                        25 next question.
25
                                                                                                                   Page 899
                                                                                                                                                                                                                                                           Page 902
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Fax:1-415-403-4004 Apr 26 '00 P. 05 OSS *DSL POR Multi-Page 'M Collaborative Session 3 MARCH 28, 2000 So if there is a question about CPE, in my example the SBC and SWBT service rep would MR HARRIS: I didn't mean to interrunt 2 I wanted to be sure.

3 MR. OWENS: That's the answer.

We have access to the ASI's SORD 3 then contact the end user to get clarification to 4 the order? MR OWENS: Yes. They would try to 5 system to obtain order status. It's ASI's SORD, 6 not the telephone company's SORD.

7 MR. HARRIS: ASI'S SORD system obtains 8 order status how? 6 obtain that information as the customer is on the 8 MR. HARRIS: If the service rep doesn't 9 have enough information to submit the order, what 10 does he do? 9 MR. OWENS: Goes down through the 10 associated systems and gives back the status. 11 MR. HARRIS: So when SEC or SWET, say for MS. SHINE: Speak to the joint marketing 11 proup general.

MR HARRIS: Then that marketing person

calls the end user to get clarification.

MS. ANDREWS: Yes.

MR. HARRIS: What about order status? I

notice CPSOS is also an order status system. Is 12 example, is going to be provisioning a loop, and 13 that loop is in jeopardy.

14 MR. OWENS: We won't know about that part.

15 MR. SIRLES: They will only know about it

16 if I flowed a jeopardy from a wholesale perspective 17 back through the interface to ASI to tell them that 18 their loop order is in jeopardy.

19 MR. HARRIS: Let me use a better example 18 there any linkage between the ASOS and CPSOS? MR. SIRLES: CPSOS goes way. Parts of it get replicated. What my understanding is of the 20 then. 21 I'm an end user. I called up SWBT. I
22 order DSL, went through the whole system. At some
23 point I can't be -- I'm not going to be home the
24 date that the SWBT technicians would be coming to 21 ASO 22 Cali 23 that ASOS, there is some inventory components. That's California, and then they go away -- I'll retract 24 25 Basically it's an order creation tool.

MR. HARRIS: I have heard elsewhere, CPSOS 25 my home. I call SWBT to tell them, correct? Page 903 Page 906 MR. SIRLES: Correct.
MR. HARRIS: That information is input is also an order status system. ns also an order status system.

MR. SIRLES: Order status system?

MR. HARRIS: Correct. I may have been wrong. I have seen this in a few documents. It's one of the things Northpoint submitted.

MR. SIRLES: California version or Southwestern version? They have the same name, and they are drastically different.

MR. HARRIS: Let's talk California 3 into what system? MR. SIRLES: ASOS, as far as I know. MR. HARRIS: And then, that goes into the 4 ASI SORD system. MR SIBGEL: It's the joint marketing person who puts that in.
MR OWENS: It's not an SWET customer 8 MR. HARRIS: Let's talk California. Does the CPSOS in California have an order status component?

MR. SIRLES: It may have because today it's inventorying the DSLAM equipment.

MR. HARRIS: It would also keep records MR. OWENS: It's not an SWBT customer
going to the prem. It's an ASI technician going to
the prem.
You as a customer calling the ASI—
the joint marketing folks to tell them you won't be
home, we would issue—have them flow the
information back over to ASI to say we need a
supplement to the order that will change the due when a trunk roll is to occur, or if a due date was in jeopardy or something like that.

MR SIRLES: That it does that. I don't know that it does not. I do know it's going away. 15 16 17 date. 18 MS. RAMSEY: Could you do blocks of all 19 the different system ASI has and do blocks of all 20 the different telephone company systems, and if 21 there is a line down the middle. Any time any of It's discontinued because the whole process 19 20 MR. HARRIS: In any of the SBC states, is there any linkage between the CPSOS and the ASOS, 21 22 those lines cross, any line comes across, anything or will there be at any point in time?

MR SIRLES: No, because the system of 23 from the telephone company to ASI, the same 24 interface is available to any other CLEC. So 25 that's the picture. Every interface, every time 25 CPSOS itself gets dismantled and goes away. Page 904 Page 907 MR. HARRIS: How will -- and forgive me the line crosses, anything the telephone company of taking too much time here -- how will ASI's end users get order status? Who will they call? Who will have access to order status information?

MR. SIRLES: Their joint marketing rep

will have that information under the customer care 2 does for ASI is available to any other CLEC. Those are the overriding marching orders and instructions and that's how they operate.

MS. TAFF-RICE: Do you suppose we can get a flow chart of this? This would help a lot. If Stephanic or someone else could give us a flow chart of how it works with ASI, that would be a tremendous help. Could we get that from their segment of the joint marketing.

MR. HARRIS: What system will they access tremendous help. Could we get that from you 10 tomorrow, perhaps?
11 MR SIRLES: I'll investigate getting joint marketing folks have read only access into 12 that, yes.

Page 905

9 to get order status?
10 MR. OWENS: Through the joint marketing
11 arrangement and the conditions, market flow, these ASI'S SORD systems and other systems.

MR. HARRIS: ASI'S SORD system?

MR. OWENS: Yes, so they have access into the SORD system of ASI, the order generating 13 14 16 17 processing system. MR. SIRLES: SORD being a service order 18 19 processor which ASI is using.
20 MR. HARRIS: Is that the same SORD system
21 that SWBT uses and Pacific Bell uses?
22 MR. OWENS: It's a different box.
23 MS. SHINE: It's a different. In fact, we
24 have different flavors. California Pacific Bell
25 has used more like the SWBT version.

MR. HARRIS: This is an issue and there is legal issue whether we are entitled to the same 15 interfaces that ASI or any affiliate is using. I 16 think if we are assured we have the exact same 17 functionality, that issue will become less 18 important. So that is, I think, the nature of my 19 concern, and a flow chart would be a giant step in 20 the right direction to EASE our concerns. No pun intended.

MR SIRLES: What I'm trying to do is 21 23 convince you we built this right under the 24 conditions, and it really is using data in exactly 25 the same manner as any of you could.

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